

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
MEMPHIS DIVISION

In Re:

Case No. 21-23424-MRH

William Tagg,

Chapter 11

Debtor

Judge M. Ruthie Hagan

**RESPONSE TO OBJECTION TO CLAIM OF DEUTSCHE BANK NATIONAL TRUST
COMPANY AS TRUSTEE FOR INDYMAC INDX MORTGAGE LOAN TRUST 2007-
AR21IP, MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2007-AR21IP**

COMES NOW, PHH Mortgage Corporation as Servicer for *Deutsche Bank National Trust Company as Trustee for Indymac Indx Mortgage Loan Trust 2007-AR21IP* (the “Trust”), *Mortgage Pass-Through Certificates Series 2007-AR21IP*, by and through the undersigned Counsel, and hereby responds to *Objection to Claim of Deutsche Bank National Trust Company as Trustee for Indymac Indx Mortgage Loan Trust 2007-AR21IP, Mortgage Pass-Through Certificates Series 2007-AR21IP* [Docket No. 34] (the “Objection”) filed by the debtor William Tagg (the “Debtor”) as follows:

PHH Mortgage Corporation is in the process of obtaining information and documentation to resolve the objection and will supplement the claim once additional documentation becomes available, if necessary.

WHEREFORE, PHH Mortgage Corporation and the Trust, its subsidiaries, affiliates, predecessors in interests, successors or assigns, requests this Court to deny the Debtor’s Motion with prejudice.

Respectfully submitted,

/s/ Bonnie S. Culp

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing and annexed pleading or paper upon:

(Served via U.S. Mail)
William Tagg
8191 Dogwood Road
Germantown, TN 38139

(Served via Electronic Notification Only)
Ted I. Jones, Jones & Garrett Law Firm
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(Served via Electronic Notification Only)
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(Served via Electronic Notification Only)
Jamaal M. Walker
Office of the United States Trustee
200 Jefferson Avenue
Suite 400
Memphis, TN 38103

This the 28th day of December 2021.

/s/ Bonnie S. Culp
Bonnie S. Culp, TN Bar No: 014741